

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

SOPHIA BALOW, et al.,

Plaintiffs,

v.

MICHIGAN STATE UNIVERSITY, et al.,

Defendants.

Civil Action No. 1:21-cv-0044

Hon. Hala Y. Jarbou

Magistrate Judge Phillip J. Green

BAILEY GLASSER, LLP
Lori Bullock AT0012240
PO Box 197, Akeny, IA 50023
Telephone: (515) 416-9051
lbullock@baileyglasser.com
Attorney for Plaintiffs

NEWKIRK ZWAGERMAN, PLC
Jill Zwagerman, AT0000324
Danya Keller AT0012300
521 E. Locust Street, Suite 300
Des Moines, IA 50309
Telephone: (515) 883-2000
jzwagerman@newkirklaw.com
dkeller@newkirklaw.com
Attorney for Plaintiffs

BOGAS & KONCIUS, PC
Brian E. Koncius (P69278)
Local Counsel for Plaintiffs
31700 Telegraph Road, Suite 160
Bingham Farms, MI 48025
Telephone: (248) 502-5001
bkoncius@kbogaslaw.com
Attorney for Plaintiffs

MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.
Scott R. Eldridge (P66452)
Brian M. Schwartz (P69018)
Ashley N. Higginson (P83992)
Erika L. Giroux (P81998)
One Michigan Ave. Suite 900
Lansing, MI 48933
eldridge@millercanfield.com
schwartzb@millercanfield.com
higginson@millercanfield.com
giroux@millercanfield.com
Attorneys for Defendants

MICHIGAN STATE UNIVERSITY OFFICE
OF THE GENERAL COUNSEL
Elizabeth M. Watza (P81129)
426 Auditorium Rd., Rm. 494
East Lansing, MI 48824-2600
(517) 353-4934
watzaeli@msu.edu
Attorneys for Defendants

**DEFENDANTS' BRIEF IN SUPPORT OF THEIR MOTION TO EXTEND DISPOSTIVE
MOTION DEADLINE**

EXPEDITED CONSIDERATION REQUESTED

For its brief, Defendants rely on their concurrently filed Motion (incorporated herein by reference), Fed. R. Civ. P. 1 and 16(b)(4), controlling case law, and this Court's Local Rules.

WHEREFORE, Defendants respectfully request an extension of the dispositive motion deadline date of May 1, 2022 (ECF No. 63) and request that a new due date be determined at the upcoming May 11, 2022 Scheduling Conference with the Court, to the extent the Settlement Conference scheduled for that same date is unsuccessful (ECF Nos. 77 and 78).

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND STONE,
P.L.C.

By: /s/ Scott R. Eldridge

Scott R. Eldridge (P66452)
Brian M. Schwartz (P69018)
Ashley N. Higginson (P83992)
Erika L. Giroux (P81998)
One Michigan Ave. Suite 900
Lansing, MI 48933
eldridge@millercanfield.com
schwartzb@millercanfield.com
higginson@millercanfield.com
giroux@millercanfield.com
Attorneys for Defendants

Dated: April 21, 2022

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF system that will send notification of such filing upon all ECF filing participants.

MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.

/s/ Scott R. Eldridge

Scott R. Eldridge (P66452)
Attorneys for Defendants
One Michigan Avenue, Suite 900
Lansing, MI 48933
(517) 483-4918
eldridge@millercanfield.com